

**EXHIBIT “B”**  
**Deniz Bolbol**  
**Transcript**

# Deposition Transcript

Case Number: 3:23-cv-01652-VC

Date: March 6, 2024

In the matter of:

CUVIELLO, et al. v ROWELL RANCH  
RODEO, INC., et al.

DENIZ BOLBOL

**CERTIFIED  
COPY**

Reported by:

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DENIZ BOLBOL  
MARCH 06, 2024

JOB NO. 886301

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3  
4 JOSEPH P. CUVIELLO and )  
DENIZ BOLBOL, individually )  
5 Plaintiffs, )  
6 vs. ) Case No. 3:23-cv-01652-VC  
7 ROWELL RANCH RODEO, INC., )  
HAYWARD AREA RECREATION AND )  
8 PARK DISTRICT, HAYWARD AREA )  
RECREATION AND PARK DISTRICT )  
9 PUBLIC SAFETY MANAGER KEVIN )  
HART, and DOES 1 and 2, in )  
10 their individually and )  
official capacities, jointly )  
11 and severally, )  
12 Defendants. )  
13  
14  
15  
16  
17  
18 VIDEOTAPED DEPOSITION OF DENIZ BOLBOL, taken at  
19 180 Montgomery Street, Suite 1200, San Francisco,  
20 California on Wednesday, March 6, 2024, at 10:13 A.M.,  
21 before April Wood Brott, Certified Shorthand Reporter  
22 Number 13782, in and for the State of California.  
23  
24 STENO  
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10:23:34 1 you're being threatened with arrest?

10:23:36 2 A. When they come up and tell you that -- when  
10:23:41 3 they answer a question, "Am I going to be arrested?"  
10:23:43 4 and they say, "Maybe," or "You'll find out," then  
10:23:47 5 you kind of know, "Well, gee, that's what they've  
10:23:51 6 got in their mind."

10:23:52 7 Q. Okay. We'll get into that in a bit.

10:23:55 8 Have you ever been arrested as a protestor?

10:23:59 9 A. I have.

10:24:00 10 Q. Okay. How many times, if you can estimate?

10:24:04 11 A. So I'm guessing a little bit, but I can  
10:24:08 12 give you a ballpark. Okay? So I think -- I was  
10:24:12 13 trying to think of this the other day. I think it's  
10:24:15 14 about three or four. Three or four, but we'll say  
10:24:20 15 three to five, just to be safe.

10:24:22 16 Q. Okay. Okay. And do you remember in  
10:24:31 17 particular when and where those occurred? And you  
10:24:36 18 can just list from your memory.

10:24:37 19 A. So the ones I remember are Cal Expo,  
10:24:49 20 Oakland, and -- oh, I just had the other one. I  
10:24:56 21 just had the other one. There's a third one I just  
10:24:59 22 remembered, and I can't remember which one it is.  
10:25:01 23 Let me think. Oh. Daly City, they took me in. So  
10:25:05 24 there's another one because I just remembered  
10:25:08 25 another one. So there's a fourth one right now that

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11:06:41 1 A. Yes.

11:06:43 2 Q. And that's similar to what you've done in  
11:06:45 3 prior years?

11:06:46 4 A. Yes.

11:06:46 5 Q. Okay. And what did the banners say, if you  
11:06:53 6 can recall any of them?

11:06:54 7 A. Something like "Rodeo's not fun for  
11:06:58 8 animals" or, you know, "Not fun for the animals" or  
11:07:02 9 "Rodeo is animal abuse," things that indicate the  
11:07:06 10 animals are suffering.

11:07:12 11 Q. Okay. And do you remember what part of the  
11:07:13 12 property you went to go protest on May 20th?

11:07:16 13 A. Yes.

11:07:17 14 Q. Can you tell me where?

11:07:18 15 A. Yes. We would walk in the main gate, and  
11:07:22 16 we'd walk right up to just before the ticket booths  
11:07:25 17 and the entrance gate to the venue.

11:07:30 18 Q. Okay. And is that common to years past as  
11:07:33 19 well?

11:07:33 20 A. Yes. Yes.

11:07:34 21 Q. Okay. And do you know who Mr. Hart is,  
11:07:45 22 Kevin Hart?

11:07:45 23 A. I do now.

11:07:46 24 Q. Had you ever met Kevin Hart prior in any  
11:07:52 25 situation --

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11:07:53 1 A. I don't recall.

11:07:53 2 Q. -- to the subject incident?

11:07:55 3 A. I don't recall.

11:07:56 4 Q. Okay. And do you recall what he was

11:08:05 5 wearing?

11:08:05 6 A. I think it was a dark shirt with his little

11:08:08 7 logo.

11:08:09 8 Q. Okay. So that would be the HARD ranger

11:08:13 9 logo?

11:08:13 10 A. Yes.

11:08:14 11 Q. That he was wearing? Okay.

11:08:21 12 Do you remember prior to Mr. Hart's arrival

11:08:33 13 whether you had an interaction with anyone from

11:08:35 14 Rowell Ranch?

11:08:37 15 A. Oh, yes.

11:08:38 16 Q. What can you recall from that interaction?

11:08:42 17 A. They tried telling us we couldn't stand

11:08:45 18 there, that we had to go to a free speech area. We

11:08:49 19 said no. I mean, it was the same old same old.

11:08:55 20 Q. Okay.

11:08:55 21 A. That we're lying, the animals are fine,

11:08:58 22 they like it. I mean, same thing all the animal

11:09:06 23 abusers say.

11:09:07 24 Q. And how did you respond to that?

11:09:12 25 A. "We're not going to a free speech zone,"

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11:24:06 1 Q. Did anyone threaten to -- from law  
11:24:10 2 enforcement or HARD threaten to physically move you?

11:24:21 3 A. Did they say the words, "I'm going to  
11:24:23 4 physically move you right now"? No.

11:24:25 5 Q. Just give me one moment here.

11:24:45 6 Did Mr. Hart ever advise you of what you  
11:24:49 7 were going to be arrested for, if anything?

11:24:51 8 A. You know, I really didn't talk to Mr. Hart,  
11:24:58 9 I don't believe, so.

11:25:00 10 Q. Did you hear the conversation between  
11:25:03 11 Mr. Hart and Mr. CuvIELLO?

11:25:06 12 A. I think I heard bits and pieces, but I  
11:25:08 13 didn't -- I wasn't paying full -- I don't recall  
11:25:12 14 paying full attention to it. But anything that was  
11:25:14 15 said during that, I just want to restate I rely on  
11:25:18 16 the video because that's a true occurrence. That's  
11:25:23 17 what happened.

11:25:23 18 Q. I understand that, but I just want to know  
11:25:25 19 if you heard it, right? So you could hear some  
11:25:28 20 things on the video at a later time, but in that  
11:25:32 21 moment --

11:25:32 22 MS. BLOME: I'm going to object as asked  
11:25:33 23 and answered. It's getting to the point where  
11:25:35 24 you're badgering her a bit.

11:25:38 25 MR. SYREN: I just want to know if she

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11:25:40 1 heard --

11:25:40 2 MS. BLOME: She said no a hundred times.

11:25:43 3 She said she doesn't -- she wasn't involved with the

11:25:44 4 Hart conversation or Mr. CuvIELlo and Mr. Hart. She

11:25:48 5 didn't hear it. She doesn't remember it. "Check

11:25:51 6 the video." She said it 50 times by now.

11:25:54 7 MR. SYREN: Okay. For the record, I'll ask

11:25:56 8 one last time, and that will be it.

11:25:57 9 MS. BLOME: No. No. Objection. It

11:25:58 10 doesn't need to be asked again.

11:26:02 11 MR. KHAN: He can still ask it.

11:26:04 12 MS. BLOME: I understand.

11:26:04 13 BY MR. SYREN:

11:26:05 14 Q. Did you hear the conversation between

11:26:06 15 Mr. Hart and Mr. CuvIELlo?

11:26:08 16 A. As I said, bits and pieces.

11:26:11 17 Q. Okay. And after that interaction, at what  
11:26:27 18 point did you first view the video that you took, if  
11:26:33 19 you can recall?

11:26:33 20 A. Probably that night.

11:26:35 21 Q. Okay. Did you have any other interactions  
11:26:45 22 with Mr. Hart later that day?

11:26:47 23 A. I don't recall personally having more  
11:26:53 24 interactions with Mr. Hart.

11:26:54 25 Q. Okay.



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11:28:02 1 A. I probably said something like "Absolutely  
11:28:06 2 not," or "Are you crazy?" or something. I don't  
11:28:10 3 know.

11:28:10 4 Q. Okay. Let's see here.

11:28:30 5 Do you remember what happened next after  
11:28:33 6 the interaction with Mr. Hart?

11:28:35 7 A. So my vague recollection, which is  
11:28:37 8 documented in realtime on video -- my vague  
11:28:41 9 recollection is Mayfield finally called the watch  
11:28:46 10 commander, and they left us alone. That's my vague  
11:28:50 11 recollection. But it didn't last.

11:28:55 12 Q. And to be clear, you never moved from the  
11:29:00 13 area you wanted to protest; is that correct?

11:29:02 14 A. That's correct.

11:29:03 15 Q. Have you heard of the term "probable cause"  
11:29:28 16 before?

11:29:28 17 A. I've heard of it.

11:29:32 18 Q. What is your understanding of probable  
11:29:37 19 cause?

11:29:37 20 A. I have no --

11:29:39 21 Q. As you understand it?

11:29:40 22 A. -- legal --

11:29:42 23 Q. Okay.

11:29:43 24 A. -- way of telling you what that is. I have  
11:29:47 25 probably a general layperson's understanding of

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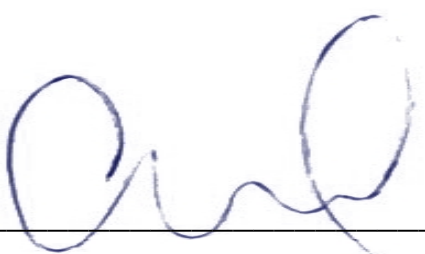
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REPORTER'S CERTIFICATION

I, April Wood Brott, Certified Shorthand Reporter  
in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn;  
that the deposition was then taken before me; that the  
testimony and proceedings were reported stenographically  
by me and later transcribed into typewriting under my  
direction; that the foregoing is a true record of the  
testimony and proceedings taken at that time.

IN WITNESS WHEREOF, I have subscribed my name  
on this date: 19th day of March 2024.



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April Wood Brott, CSR No. 13782